

UNITED STATES DISTRICT COURT
FOR THE MIDDLE DISTRICT OF FLORIDA

KASRA REZAEI,



Petitioner

v.

DONALD J. TRUMP, in his official capacity
as President of the United States; KRISTI
NOEM, U.S. Secretary of Homeland
Security; PAMELA BONDI, U.S. Attorney
General, TODD M. LYONS, in his official
capacity as Acting Director, U.S. Immigration
and Customs Enforcement; GARRETT RIPA,
in his official capacity as Assistant Field
Officer in charge of Miami Field Office;
LOUIS A. QUINONES, Jr., Chief, Orange
County Corrections Dep't,

Respondents

Case No. 6:25-cv-1140

**AMENDED¹ EMERGENCY MOTION FOR
A TEMPORARY RESTRAINING ORDER
AND PRELIMINARY INJUNCTION**

On June 25, 2025, Kasra Rezaei, a native and citizen of Iran, was in the middle of his hearing in immigration court when Department of Homeland Security (“DHS”) Immigration and Customs Enforcement (“ICE”) agents entered the courtroom, interrupted the hearing, and took Mr. Rezaei into immigration custody without an arrest warrant or providing any notice of a custody determination. The immigration court and the immigration judge allowed this unlawful action. Mr. Rezaei is currently held at Orange County Correctional Facility.

¹ Petitioner files this amended motion, along with an amended petition, with one factual update that was discovered after the initial filing. Notably, as discussed in the petition and the motion, undersigned counsel learned after filing the initial pleadings that Mr. Rezaei had been paroled into the United States and that initial parole term expired in January. This fact does not change the reality that Mr. Rezaei was detained in the middle of his testimony, precluded from finishing his hearing, and detained without notice or reason.

Mr. Rezaee is not subject to either a final order of removal or an expedited order of removal. His proceedings before the Executive Office for Immigration Review could not be completed. Mr. Rezaee's detention without a warrant or notice of a custody determination, and his continued detention without the opportunity to challenge the detention violates his constitutional due process rights. Mr. Rezaee has filed a petition for a writ of habeas corpus in this Court.

Mr. Rezaee was in the middle of his proceedings in immigration court when he was unlawfully apprehended and detained. His removal outside of the Middle District of Florida will frustrate his constitutional due process rights to his removal proceedings. Therefore, Mr. Rezaee requests an emergency order precluding Respondents from transferring him outside of this district.

June 30, 2025

Respectfully submitted,

/s/ Jessica Dawgert

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